



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

BDM:KKO  
F. #2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 21, 2020

By ECF

Honorable Nicholas G. Garaufis  
United State District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere  
Criminal Docket No. 18-204 (S-2)(NGG)

Dear Judge Garaufis:

The government respectfully submits the enclosed proposed general Order of Forfeiture (the "Proposed Order") in connection with the sentencing of defendant Keith Raniere in the above-captioned case. Pursuant to Rule 32.2(b)(2)(C) of the Federal Rules of Criminal Procedure, the Court may enter a "general order of forfeiture" at the time of the defendant's sentencing stating that such order will be amended pursuant to Rule 32.2(e)(1) when the amount of the money judgment has been calculated. Sentencing is currently scheduled for October 27, 2020.

By letter dated June 13, 2019, the government advised the Court and defendant that it would pursue entry of a forfeiture money judgment in the event of the defendant's conviction at trial. (Docket Entry No. 710, Letter). Following a six-week jury trial, the defendant was convicted of all charges submitted to the jury, including racketeering and racketeering conspiracy. (Docket Entry No. 735, Verdict). In light of the Court's entry of preliminary orders concerning specific assets forfeited by Raniere's co-defendants, the only remaining forfeiture issue before the Court is the amount of a forfeiture money judgment to be imposed on Raniere. Notably, Raniere is liable for a forfeiture money judgment representing "any property constituting, or derived from, any proceeds which [Raniere] obtained, directly or indirectly, from racketeering activity . . . in violation of section 1962." 18 U.S.C. § 1963(a)(3).

The government intends to seek a forfeiture money judgment based upon the amount of proceeds Raniere received as a result of his racketeering activities. Specifically, the government is reviewing bank records for an account held by First Principles

Incorporated to determine the amount of deposits that represent Raniere's royalties and fees paid by Nxivm affiliates. The government proposes that its calculation of the forfeiture money judgment amount be submitted no later than November 10, 2020.

Accordingly, the government respectfully requests that the Court so-order the Proposed Order.

Respectfully submitted,

SETH D. DuCHARME  
Acting United States Attorney

By: /s/  
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Assistant U.S. Attorney  
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Enclosure: Proposed Order of Forfeiture

Cc: Counsel of Record (by ECF)